

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

BMW of North Charleston, LLC and Riverland, LLC,	)	Civil Action No.: 2:18-cv-01872-RMG
	)	
Plaintiffs,	)	<b>DEFENDANT DRUCKER &amp; FALK, LLC's</b>
	)	<b>RESPONSES TO LOCAL RULE 26.01</b>
v.	)	<b>INTERROGATORIES</b>
	)	
Quality Exteriors Group, LLC; Donnie Hawkins; and Drucker & Faulk, LLC,	)	
	)	
Defendants.	)	

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The Defendant, Drucker & Falk, LLC, incorrectly sued herein as Drucker & Faulk, LLC by and through the undersigned counsel, responds to Local Rule 26.01 Interrogatories as follows:

1. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**RESPONSE:** At this time, Defendant, Drucker & Falk LLC, are not aware of any parties with potential subrogation interests.

2. As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE:** Defendant, Drucker & Falk, LLC, requests a jury trial as to all claims since liability, causation, and damages are in dispute.

3. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and

(3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE:** **Defendant, Drucker & Falk LLC, is not a publicly-owned company.**

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

**RESPONSE:** **The events giving rise to this action occurred in Charleston County, South Carolina. Accordingly, the United States District Court, Charleston Division, is the proper division for this action.**

5. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide, (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may* be related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE:** **Defendant, Drucker & Falk LLC, is not aware of any other matter related to this action.**

6. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE:** **Defendant, Drucker & Falk, LLC, is improperly identified as “Drucker & Faulk, LLC”. The proper identification is “Drucker & Falk, LLC.” Counsel**

**will accept service of an amended summons and pleading reflecting the proper correct identification.**

7. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE: Defendant, Drucker & Falk LLC, relies on the defenses asserted in its Answer and is not aware of any additional potentially liable parties at this time.**

GALLIVAN, WHITE & BOYD, P.A.

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**Attorneys for Defendant  
Drucker & Falk, LLC**

Charleston, South Carolina

Dated: August 14, 2018